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6 Attorneys for Defendant  
SALVADOR ORTIZ-PADILLA  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.  
16

Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO CONTINUE CHANGE OF  
PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective  
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant  
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea  
20 hearing currently scheduled for January 16, 2024, may be continued to January 29, 2024, at 9:00  
21 a.m.

22 The parties have been in active plea negotiations regarding this case. Final edits are  
23 currently being made to the proposed plea agreement. Once made, undersigned counsel requires  
24 additional time to go over the plea offer in detail with Mr. Ortiz-Padilla and to file the necessary  
25 plea documents sufficiently in advance of the change of plea hearing. As a result, the parties are  
26 requesting to continue the January 16, 2024 change of plea hearing to January 29, 2024. This  
27 will provide time for the parties to finalize the plea documents prior to the change of plea  
28 hearing.

The requested continuance is made with the intention of conserving time and resources for both the parties and the Court. The government is in agreement with this request and the requested date is a mutually agreeable date for both parties. The parties stipulate that for the purpose of computing time under the Speedy Trial Act, the Court should exclude time from the date of this order through January 29, 2024, for defense preparation and investigation, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by resetting the change of plea hearing outweigh the best interest of the public and the defendant in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: January 10, 2024

*/s/ Reed Grantham*

REED GRANTHAM  
Assistant Federal Defender  
Attorney for Defendant  
SALVADOR ORTIZ-PADILLA

PHILLIP A. TALBERT  
United States Attorney

Date: January 10, 2024

/s/ *Justin Gilio*

**JUSTIN GILIO**  
Assistant United States Attorney  
Attorney for Plaintiff

**ORDER**

**IT IS SO ORDERED.** The change of plea hearing currently set for January 16, 2024, is hereby continued to January 29, 2024, at 9:00 a.m.

The time through January 29, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **January 10, 2024**

  
UNITED STATES DISTRICT JUDGE